

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

MILLENNIUM FUNDING, INC., et al,

Plaintiffs,

v.

WICKED TECHNOLOGY LIMITED et al.,

Defendants.

Civil Action No. 1:21-cv-00282-RDA-TCB

**PLAINTIFFS' NOTICE OF SUBMISSION OF AMENDED PROPOSED ORDER FOR
MOTION FOR DEFAULT JUDGMENT
AGAINST DEFENDANT DOE d/b/a POPCORN TIME.APP**

Plaintiffs MILLENNIUM FUNDING, INC., EVE NEVADA, LLC, HUNTER KILLER PRODUCTIONS, INC., BODYGUARD PRODUCTIONS, INC., GUNFIGHTER PRODUCTIONS, LLC, MILLENNIUM IP, INC., VOLTAGE HOLDINGS, LLC, KILLING LINK DISTRIBUTION, LLC, LHF PRODUCTIONS, INC., RAMBO V PRODUCTIONS, INC., NIKOLA PRODUCTIONS, INC., OUTPOST PRODUCTIONS, INC., WONDER ONE, LLC and 42 VENTURES, LLC ("Plaintiffs"), by and through their counsel, submit an amended proposed order for their Motion for Default Judgment [Doc. #42] against Defendant Doe d/b/a POPCORN TIME.APP previously submitted on Aug. 23, 2021 for this Court's consideration. The amended proposed order limits the scope of requested injunctive relief to Defendant Doe d/b/a POPCORN TIME.APP. The amended proposed order is submitted without prejudice to Plaintiffs rights to request further injunctive relief in the future.

Exhibit "1" is a marked-up version of the amended proposed order to show changes with respect to the previous submitted revised order.

DATED: Kailua Kona, HI, Oct. 13, 2021.

Respectfully submitted,

/s/ Kerry S. Culpepper

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CERTIFICATE OF SERVICE

I hereby certify that on Oct. 13, 2021, a true and correct copy of the foregoing was filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to the following:

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I further certify that on Oct. 13, 2021 a true and correct copy of the foregoing was served by email to the following:

JOHN OR JANE DOE d/b/a POPCORNTIME.APP	hello@popcorntime.sh
JOHN OR JANE DOE d/b/a POPCORNTIME.APP	7efd1e7ec8dd9cc42c87d178fb98497d-19003537@contact.gandi.net

DATED: Kailua Kona, HI, Oct. 13, 2021.

Respectfully submitted,

/s/ Kerry S. Culpepper

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